

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA,

Plaintiff,

VS.

WESTWARD MANAGEMENT, INC.,
KENMORE CLUB CONDOMINIUM
ASSOCIATION, HARRY CHANNON and
DAWN CHANNON,

Defendants.

Case No: 1:23-cv-01154

Hon. Sara L. Ellis

AGREED MOTION OF DEFENDANT WESTWARD MANAGEMENT, INC.
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

NOW COMES Defendant WESTWARD MANAGEMENT, INC., by and through its attorneys, JAMES M. WECK, ILENE M. KOREY and CLAUSEN MILLER P.C., and for its Agreed Motion for Extension of Time to Answer or Otherwise Plead, states as follows:

1. Plaintiff filed its Complaint for Declaratory Judgment on February 24, 2023.
2. On or about March 13, 2023 Defendant was served with summons.
3. The undersigned filed his Appearance on behalf of Defendant on March 29, 2023.
4. Defendant needs additional time to investigate the facts and issues presented by

Plaintiff's Complaint for Declaratory Judgment.

5. Defendant requests an extension of time, until May 8, 2023, to answer or otherwise plead in this matter.

6. Plaintiff's counsel does not object to this request for additional time.
7. This motion is brought in good faith and not for delay or any improper purpose.

WHEREFORE, Defendant WESTWARD MANAGEMENT, INC., respectfully requests that this Honorable Court enter the following order: (1) granting Defendant's Agreed Motion for Extension of Time to Answer or Otherwise Plead; and (2) allowing Defendant Westward Management, Inc., until May 8, 2023, to answer or otherwise plead.

James M. Weck

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Attorneys for Defendant Westward Management,

CERTIFICATE OF SERVICE

The undersigned, a non-attorney, hereby certifies that on the 4th day of April 2023, she electronically filed the foregoing **Defendant Westward Management, Inc.'s Agreed Motion for Extension of Time to Answer or Otherwise Plead** with the Clerk of the Court using CM/ECF system which sent notification of such filing to the parties who are registered participants with the System.

Patricia Kebr

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